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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

UNITED STATES OF AMERICA, Plaintiff, v. JASON DEAN HARE, Defendant.	STIPULATED MOTION TO CONTINUE JURY TRIAL Case No. 2:22-cr-00022 DBB District Judge David Barlow Magistrate Judge Daphne A. Oberg
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Defendant, by his attorney, moves the Court to continue the trial date currently set for June 24, 2022.

An Indictment/Information was issued on January 6, 2022. Defendant first appeared before a judicial officer of the court on February 3, 2022. Trial was set for April 11, 2022.

Mr. Hare seeks a continuance under [18 U.S.C. § 3161\(h\)\(7\)\(A\)](#) **Defendant** alleges that the continuance is necessary to allow counsel adequate time to prepare for trial.

The following factual assertions support defendant's request. Mr. Hare was represented by the Federal Defender's Office until May 27, 2022. That office intended to file a motion to continue the trial based on a need to file certain pretrial motions determined to be viable through the process of investigation and discovery. On May 27, 2022, the undersigned was retained by Mr. Hare to represent him in this matter. Counsel immediately requested and was provided discovery materials. Four weeks is not an adequate amount of time to prepare for a trial of this

nature. Counsel needs additional time to familiarize himself with the discovery materials and to file the suggested pretrial motions if those are appropriate.

The ends of justice in Mr. Hare having properly prepared and effective representation at trial outweigh any interest he or the public may have in a more speedy resolution to this matter. Counsel can be adequately prepared to represent Mr. Hare in a period of 90 days given the discovery involved in the case, the need for further investigation, the need to meet with Mr. Hare to review discovery and the filing of appropriate pretrial motions.

Mr. Hare is aware of the need for a continuance and does not oppose it. Mr. Hare is in custody on other matters filed in state proceedings.

Counsel for Mr. Hare has spoken directly to the Assistant United States Attorney assigned to this matter, Mark Hirata, and Mr. Hirata stipulates that this motion should be granted.

One other continuance was requested by prior counsel.

Defendant requests a continuance of 90 days as set forth above.

DATED this 8th day of June, 2022.

/s/ Edward K. Brass
EDWARD K. BRASS
Attorney for Defendant